#### UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

٠					
I	n	1	r	0	٠
ı			ш	ᆫ	

AARON TERRILL KEMP

\* Debtor

Case Number: 5-22-02400

Chapter: 1

## **CERTIFICATE OF MAILING**

The undersigned employee in the office of:

Tullio DeLuca, Esquire

hereby certifies that a copy of the attached Notice and Motion to Suspend Trustee

Payment was mailed today to all parties named on the mailing list attached hereto

by regular first class mail.

DATED: August 20, 2025

SIGNED:

TITLE: /s/Legal Assistant

#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

**AARON TERRILL KEMP** 

CHAPTER 13

CASE NO. 5-22-02400

Debtor

**AARON TERRILL KEMP** 

MOVANTS

VS.

JACK N. ZAHAROPOULOS ESQ. RESPONDENT

### NOTICE TO CREDITORS AND OTHER PARTIES IN INTEREST

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection, or other matter without further notice or hearing unless a party in interest files an objection/response on or before September 10, 2025. If you object to the relief requested, you must file your objection/response with the Clerk of Court and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

Date: August 20, 2025

Tullio DeLuca, Esquire PA ID# 59887 Attorney for Debtors/Movants 381 N. 9th Avenue Scranton, PA 18504

Clerk, U.S. Bankruptcy Court 197 South Main Street Wilkes-Barre, PA 18701

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

AARON TERRILL KEMP : CHAPTER 13

:

CASE NO. 5-22-02400

Debtor :

AARON TERRILL KEMP .

VIP

MOVANT

VS.

JACK N. ZAHAROPOULOS ESQ.

RESPONDENT

AMENDED MOTION TO SUSPEND TEMPORARILY TRUSTEE PAYMENTS

AND NOW COMES, the Debtor, Aaron Terril Kemp, by and through his attorney, Tullio DeLuca, Esquire, and respectfully represents:

- 1. That the Debtor filed a Chapter 13 Petition on December 13, 2022
- 2. That Debtor's Chapter 13 Plan provides for monthly payments of \$961.00 to the Chapter 13 Trustee to pay attorney and Trustee fees and secured creditors.
- 3. The Motion is being Amended, as the previous Motion to Suspend Trustee Payments was inadvertently not served on all creditors.
- 4. Debtor has experienced a temporary loss of income due to wife's unemployment.
- 5. Therefore, Debtor is not in a position to make the Trustee payments until his immediate problem stabilizes and regains income to satisfy the Chapter 13 Plan.
- 6. In light of the above, Debtor requests a Temporary Suspension of his Trustee payments for a period of three (3) months or earlier starting in the month of May 2025. If Debtor's immediate problem stabilizes, Debtor will commence Trustee payments sooner.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order allowing for a suspension of Trustee's monthly payments for a period of at least three (3) months and directing the Debtor to commence making monthly payments sooner if Debtor's immediate problem stabilizes.

Respectfully submitted,

Dated: August 20, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID # 59887
381 N. 9th Avenue
Scranton, Pa 18504
(570) 347-7764
Attorney for Debtor

IN THE UNITED S FOR THE MIDDLE	STATES BANKRUPTCY COURT E DISTRICT OF PENNSYLVANIA
IN RE: AARON TERRILL KEMP  Debtors	: CHAPTER 13 : CASE NO. 5-22-02400
AARON TERRILL KEMP	•
MOVANTS VS. JACK N. ZAHAROPOULOS ESQ. RESPONDENT	

After notice and service to creditors and parties in interest under FRBP 9013 and upon consideration of the Debtor's Motion to Suspend Temporarily Trustee Payments, it is hereby ORDERED, ADJUDGED AND DECREED by this Honorable Court that the Debtor's Motion to Suspend Temporarily Trustee Payments is granted and the Debtor is allowed to suspend payments to the Chapter 13 Trustee for a period of three (3) months from May 2025 to July 2025 due to loss of income and it is further ordered that if the Debtor's wife returns to gainful employment prior to the three (3) month period, Debtor, is ordered to commence making monthly payments to the Chapter 13 Trustee.

**ORDER** 

CKS Prime Investments, LLC 1800 Route 34 N, Bldg 3 Suite 305 Wall, NJ 07719-9168

Capital One PO Box 30285 Salt Lake City, UT 84130-0285 Capital One N.A. by American InfoSource as agent PO Box 71083 Charlotte, NC 28272-1083

CONTINENTAL FINANCE COMPANY PO BOX 3220 BUFFALO NY 14240-3220 Credit One Bank P.O. Box 98872 Las Vegas, NV 89193-8872 First Premier Bank P.O. Box 5524 Sioux Falls, SD 57117-5524

LVNV Funding, LLC c/o Resurgent Capital Srvc 355 S Main St, Ste 300- D Greenville, SC 29601-2923

LVNV Funding, LLC c/o Resurgent Capital Serv PO Box 10587 Greenville, SC 29603-0587 Mr. Cooper 8950 Cypress Waters Blvd Dallas, TX 75019-4620

NATIONSTAR MORTGAGE LLC PO BOX 619096 DALLAS TX 75261-9096 Premier Bankcard, LLC
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud MN 56302-7999

Quantum3 Group LLC as agent for Galaxy International Purchasing LLC PO Box 788 Kirkland, WA 98083-0788

US DEPARTMENT OF HOUSING & URBAN DEVELOPMENT ATTN OFFICE OF REGIONAL COUNSEL 801 MARKET STREET, 12<sup>TI</sup> FLOOD PHILADELPHIA, PA 19107

United States Trustee 228 Walnut Street, Suite 1190 Harrisburg, PA 17101-1722 JACK N ZAHAROPOULOS ATTN CHAPTER 13 TRUSTEE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036-8625

Desc